

LEAD TESTING IN SCHOOL AND CHILD CARE PROGRAM DRINKING WATER GRANT

2019 Grant Program

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WORK PLAN FOR THE STATE OF Georgia

Summary Statement

The State of Georgia Department of Education (GaDOE) is committed to addressing lead in drinking water in our schools and the overall reduction of childhood lead exposure across our state. This is why, in 2018, Governor Brian Kemp supported the voluntary initiative to test schools using EPA's *3Ts for Reducing Lead in Drinking Water in Schools and Child Care Facilities*.

With the funding appropriated under section 1464(d) of the Safe Drinking Water Act, amended by the Water Infrastructure Improvement Act (WIIN) section 2107, GaDOE, along with its partner agencies, will offer assistance for voluntary testing of schools. This will include the prioritization of facilities serving younger children (ages 6 and under), underserved and low-income communities, and facilities that are older and more likely to contain lead plumbing.

GaDOE is using EPA's 3Ts guidance as a model to: (1) **Communicate**, throughout the implementation of the program, the results and important lead information to the public, parents, teachers, and larger community; (2) **Train** on the risks of lead in drinking water and testing for lead, as well as developing key partnerships to support the program; (3) **Test** using appropriate testing protocols and a certified laboratory; and (4) **Take Action**, including the development of a plan for responding to results of testing conducted and addressing potential elevated lead where necessary.

SCOPE OF WORK

This section is a discussion of Georgia's plan to develop and implement the lead testing program in schools and how these programs meet goals as they relate to the reduction of lead in drinking water exposure in children.

The scope of work contained in this project description includes the following categories and information.

- I. STATE GOALS AND PRIORITIES
- II. PROGRAM IMPLEMENTATION AND ACTIVITIES
- III. ROLES AND RESPONSIBILITIES
- IV. TIMELINE AND MILESTONES
- V. WIIN PROGRAMMATIC PRIORITIES AND EPA'S STRATEGIC PLAN LINKAGE
- VI. ANTICIPATED OUTCOMES/OUTPUTS
- VII. BUDGET NARRATIVE

I. STATE GOALS AND PRIORITIES:

Georgia has 1,759,838 students enrolled in a total of 2,302 public schools in 180 school districts. GaDOE has identified goals and priorities consistent with the priorities outlined in EPA's State Lead Testing in School and Child Care Program Drinking Water Grant Implementation Document (found here: www.epa.gov/safewater/grants).

In accordance with the America's Waters Infrastructure Act (AWIA) of 2018, which amended the SDWA section 1464(d), GaDOE will assist in voluntary testing for lead contamination in drinking water at school facilities that are in low-income areas. This is described based upon the affordability criteria established by the State under SDWA section 1452(d)(3). This may include Schools with at least 50% of the children receiving free and reduced lunch and Head Start facilities located at K-12 facilities where testing will occur. Other priorities will include facilities constructed prior to 1990 that are more likely to contain lead in plumbing.

Since GaDOE has oversight over K-12 public facilities, the focus will be to test facilities that house pre-kindergarten and Head Start programs. Licensed child care facilities will not be tested during this two-year grant cycle but will be consider if further funding is made available.

It is GaDOE's goal to reduce lead exposure at these facilities by testing for lead, identifying potential lead sources, and taking action where lead contamination is greater than 15ppb. Remediation may include, but not be limited to, replacing fixtures, filtering water, and conducting regular maintenance to include re-testing as needed. Using the priorities listed above, this testing effort includes the goals of:

- a. Testing all outlets used for consumption at 35% of all school facilities in low-income areas by the end of the project period.

- b. Providing education about lead in drinking water and the importance of lead testing to all 180 school districts.

II. PROGRAM IMPLEMENTATION AND ACTIVITIES:

GaDOE is utilizing EPA's 3Ts guidance (www.epa.gov/safewater/3ts) to implement this voluntary testing program. Georgia school systems with prioritized facilities will be encouraged to take advantage of this opportunity to ensure access to a healthy drinking water supply by participating in this testing opportunity at little or no cost to the district. This includes efforts to (1) **Communicate**, throughout the implementation of the program, the results and important lead information to the public, parents, teachers, and larger community; (2) **Train** on the risks of lead in drinking water and testing for lead, as well as developing key partnerships to support the program; (3) **Test** using appropriate testing protocols and a certified laboratory; and (4) **Take Action**, including the development of a plan for responding to results of testing conducted and addressing potential elevated lead where necessary. Below are specific activities included in these key elements:

- a. **Communication:** GaDOE will establish key partnerships to support the program as well as keeping the public informed. GaDOE recognizes that timely dissemination of communication materials is of the utmost importance. Therefore, information about the sampling program and lead in drinking water will be shared before the lead in drinking water sampling program begins, after obtaining the results of testing, when/if corrective measures are decided upon (and in the event no corrective measures are appropriate because the lead levels are low), and in response to periodic interest in the program. Specifically:

- Notifications will occur at least 30 days prior to testing at that facility
- Testing results will be shared with the school community as soon as possible, but no later than 2 weeks following the receipt of the final results.
- Press releases and public meetings will be held, in collaboration with school district leaders, at least once a year.
- General public education and updates to the testing website will be made on an ongoing basis and can be accessed by the public at www.gadoe.org/Facilities-Services/Pages/default.aspx

GaDOE and its partners will be using a variety of methods to communicate and be transparent throughout this program with the goal of reaching the target audiences; including: press releases, letters/fliers, presentations, email and websites. In addition, school facilities will make available, in the administrative offices and/or on their public website, if applicable, a copy of the results of any voluntary testing.

GaDOE has identified our target audiences as: the school community (e.g. parents, teachers, and staff), the larger community, local community organizations, and the drinking water community (e.g. utilities serving these facilities).

- b. **Training:** Training will include education and training on the risks of lead in drinking water and testing for lead to the community or surrounding residential area that is impacted by testing, as well as key partnerships to support the program. GaDOE will also post resources and materials on its website for access by the public. Training will include the causes and health effects of lead in drinking water as well as training on program plan and sampling procedures.

GaDOE will be working with a third-party contractor to reach stakeholders and disseminate information. Educational Facilities Consultants from GaDOE will serve as the liaison between the contractor and identified school systems.

GaDOE will also develop key partnerships to support the program and help train staff.

- c. **Testing:** GaDOE is utilizing EPA's 3Ts guidance 2-step sampling protocol, as described at https://www.epa.gov/sites/production/files/2018-09/documents/module_5_3ts_2-step_sampling_protocol_508.pdf, and laboratories certified to test lead in drinking water to process and analyze samples collected under this program. To reach as many facilities as possible, we will be taking the initial 250 mL first draw sample at each tap and following up with the flush samples at locations identified with elevated lead. Outlets not being tested will be labeled as "not for drinking water." This may include utility sinks and certain bathroom sinks.

GaDOE will be working with a third party contractor to develop sampling plans and conduct initial site assessment, as well as collect initial and follow-up flush samples at identified facilities. GaDOE anticipates:

- 800 schools to be tested at every source of drinking water within the facility; and
- 2.5% of the taps to require additional sampling (e.g. follow-up flush sampling).

All sampling efforts under this program will be properly coded and recorded using the coding system and recordkeeping recommendations identified in EPA's 3Ts guidance. Samples will be analyzed by Georgia's Environmental Protection Division lab. The lab has budgeted 2,000 samples per month during months when sampling can be appropriately conducted. In order to reach our goal of sampling at 800 facilities, it may be necessary to use a contract lab to analyze samples. Any necessary contract lab will be determined at a later date.

- d. **Taking Action:** GaDOE has developed a plan for responding to results of testing conducted and addressing potential elevated lead where necessary. Responses to results will follow remediation recommendations in the 3Ts guidance. The plan includes action at sample sites with results above the state action level of 15 parts per billion (the action

level in the federal Lead and Copper Rule). This plan also includes the sampling post-remediation to ensure efforts to reduce lead levels were effective.

Resources that have previously been made available for testing for lead contamination in drinking water in Georgia schools will not be replaced by funds provided from this SDWA 1464(d) grant. Grant funding will be used to supplement and enhance existing resources.

III. ROLES AND RESPONSIBILITIES:

A list of roles and responsibilities are listed below, and potential project partners are identified in Appendix A.

3Ts Program Contact: This person will act as the point of contact for your 3Ts Program and help coordinate the communication efforts.	Mike Rowland Asst. Director Facilities Services GaDOE (404) 617-9409 mrowland@doe.k12.ga.us
Public Communications Team: Communicate testing plans, results, and remediation efforts to the public. The public consists of, but is not limited to, the school community, media outlets, civic groups, etc. Georgia DPH: assist in developing communication plan for communities	Meghan Frick Director of Communications GaDOE (404) 463-4246 mfrick@doe.k12.ga.us Dr. Kathleen Toomey, Commissioner Georgia Department of Public Health 2 Peachtree Street, NW 15th Floor Atlanta, GA 30303-3186
Sample Testing and Shipping Containers: Ship containers to facilities, test the samples and provide a report to the GaDOE and contractor.	Lewis Hayes GA Environmental Protection Division 2 Martin Luther King, Jr. drive Suite 1456, East Tower Atlanta, GA 30334 lewis.hays@dnr.ga.gov
Website Contact: This person will make sure websites stay up to date with the latest information.	Kelland Waldrep Ed Research and Evaluation Spec GaDOE (404) 656-4538 KWaldrep@doe.k12.ga.us
Partner Liaison Contact: This person will work with certified laboratories, interest groups, the school board, and other partners supporting and interested in the school's 3Ts Program to schedule activities and maintain communication.	Mike Rowland Asst. Director Facilities Services GaDOE (404) 617-9409 mrowland@doe.k12.ga.us

<p>Sampling Plan and Execution Contact: This person will lead the effort to develop a sampling plan for the school. They will also engage with other program points of contact and external resources and partners as appropriate.</p>	<p>Mike Rowland Asst. Director Facilities Services GaDOE (404) 617-9409 mrowland@doe.k12.ga.us</p> <p>Contractor to be determined</p>
<p>Remediation Activities Contact: This person will serve as a point of contact for inspectors, and if necessary, for local facility staff to provide guidance on any required remediation efforts.</p>	<p>Gerald Williams Lead Architect GaDOE (404) 656-4506 GeWillia@doe.k12.ga.us</p>
<p>Recordkeeping Contact: Ensure a central repository is created to house all 3Ts Program documents.</p>	<p>Kelland Waldrep Ed Research and Evaluation Spec GaDOE (404) 656-4538 KWaldrep@doe.k12.ga.us</p>

IV. TIMELINE AND MILESTONES:

A detailed timeline for the project, including milestones for specific tasks, can be found below. Fiscal year beginning October 1, 2019.

- **FY2019 Quarter 4:** Begin assembling program team; publish resources and information GaDOE webpage.
- **FY2020 Quarter 1:** Solicitation of project partners early in the process to include the preparation of a Memorandum of Agreement (MOA) for partners; notification to sub awardees; beginning of public communication about the grant program and training of program personnel; and beginning collection of important information pertaining to sampling (e.g. past sampling activities, records, building construction, building layouts); receive funding from federal award agency.
 - GaDOE first press release and public meeting.
- **FY2020 Quarter 2:** Continue to develop sample site plans (including any plumbing profiles and/or walk-throughs needed for first set of facilities); notify the school community of plan to sample and important information about lead in drinking water; and begin initial sampling at facilities identified by the priorities listed in the previous section.
- **FY2020 Quarter 3:** Continue to develop sample site plans; notify school community of plan to sample and important information about lead in drinking water; and conduct initial sampling at facilities identified by the priorities listed in the previous section; take action where elevated lead levels are identified; share results of testing as soon as possible but no later than two weeks after receipt of final results; support schools in community outreach; conduct follow-up sampling where needed.

- GaDOE second press release and public meeting.
- **FY2020 Quarter 4:** Conduct initial sampling at facilities identified by the priorities listed in the previous section; take action where elevated lead levels are identified; share results of testing as soon as possible but no later than two weeks after receipt of final results; support schools and child care programs in community outreach; inform sub awardees on routine practices that can improve water quality (especially as some facilities close and open for summer months).
- **FY2021 Quarter 1:** Continue to develop sample site plans; notify school community of plan to sample and important information about lead in drinking water; support schools in community outreach.
 - **GaDOE expects to have sampled at 35% of the total schools noted in this workplan by this point.**
- **FY2021 Quarter 2:** Continue to develop sample site plans; notify school and c community of plan to sample and provide important information about lead in drinking water; prepare for sampling to resume during appropriate months in Quarter 3. continue action plans where elevated lead levels were identified in FY 2020.
- **FY2021 Quarter 3:** Continue to develop sample site plans; notify school community of plan to sample and important information about lead in drinking water; and conduct initial sampling at facilities identified by the priorities listed in the previous section; take action where elevated lead levels are identified; share result of testing as soon as possible but no later than two weeks after receipt of final results; support schools in community outreach; inform sub awardees on routine practices that can improve water quality (especially as some facilities close and open for summer months).
- **FY2021 Quarter 4:** Continue to develop sample site plans; notify school community of plan to sample and important information about lead in drinking water; and conduct initial sampling at facilities identified by the priorities listed in the previous section; take action where elevated lead levels are identified; share result of testing as soon as possible but no later than two weeks after receipt of final results; support schools in community outreach; conduct follow-up sampling where needed; inform sub awardees on routine practices that can improve water quality (especially as some facilities close and open for summer months).
 - GaDOE third press release and public meeting.
 - **GaDOE expects to have sampled 100% of identified school facilities.**

V. WIIN PROGRAMMATIC PRIORITIES AND EPA’S STRATEGIC PLAN:

The principal objective of the assistance to be awarded under this program is to provide grants to states to help local education agencies to test schools and child care facilities for lead contamination in drinking water, utilizing EPA’s 3Ts guidance or applicable state regulations or guidance that are not less stringent. Since GaDOE has oversight over K-12 public facilities, and since many of these facilities house pre-kindergarten and Head Start programs, child care facilities are not a focus of this work plan. The objective of the Program is to: (1) Reduce children’s exposure to lead in drinking water; (2) Help states target funding toward schools and

child care programs unable to pay for testing; (3) Utilize the 3Ts model or model no less stringent to establish best practices for a lead in drinking water prevention program; (4) Foster sustainable partnerships at the state and local level to allow for more efficient use of existing resources and exchange of information among experts in various educational and health sectors; and (5) Enhance community, parent, and teacher cooperation and trust.

The activities described in this work plan support the WIIN Programmatic Priorities and EPA's FY 2018-22 Strategic Plan, Goal 1, "Core Mission: Deliver real results to provide Americans with clean air, land, and water, and ensure chemical safety," Objective 1.2, "Provide for Clean and Safe Drinking Water: Ensure waters are clean through improved water infrastructure and, in partnership with states and tribes, sustainably manage programs to support drinking water, aquatic ecosystems, and recreational, economic, and subsistence activities."

VI. ANTICIPATED OUTCOMES/OUTPUTS:

Outputs and outcomes expected to be achieved under the agreement are described below.

Outputs for this project include: (1) Use the EPA's 3Ts for Reducing Lead in Drinking Water guidance to implement the state program; (2) Development of a state lead testing in drinking water in schools and childcare facilities management strategy that supports a robust training, monitoring, and maintenance plan that protects children from lead exposure now and in the future; (3) Prioritization of testing to target vulnerable communities and populations: schools in underserved and/or low-income communities; older facilities that are more likely to contain lead plumbing; (4) Providing results of any voluntary testing for lead contamination in school facility drinking water carried out using grant funds and notifying parents, teachers, and organizations of the availability of the results; (5) Establishment of routine practices such as those outlined in the 3Ts guidance.

Outputs also include the execution of a memorandum of agreement (MOA) between partnering agencies to implement this program.

Outcomes for this project includes: (1) Schools unable to pay for testing, implementing a testing program and mitigating lead exposure by utilizing the 3Ts toolkit in determining best action to take for remediation; (2) The reduction of children's exposure to lead in drinking water; (3) Improvement of staff and community knowledge on lead in drinking water and other environmental harms; and (5) Water quality improvement and lead exposure reduction in drinking water; and (6) Establishment of routine practices such as those outlined in the 3Ts guidance.

Other outcomes include: (1) Fostering sustainable partnerships at the state and local level to allow for a more efficient use of resources and the exchange of information among experts in various areas of school, utility, and health sectors; and (2) The enhancement of community, parent, and teacher trust.

VII. BUDGET NARRATIVE:

The total anticipated grant amount will be \$1,102,000. GaDOE anticipates that costs related to the administration of the grant will be absorbed by GaDOE. Consequently, all grant funds will be used for training, developing sustainable partnerships, sample collection and analysis, reporting results, and record keeping.

Sampling and Testing	Cost per Sample	Schools to be tested	# Samples per School	Total # Samples	Testing Costs
Ga EPD Lab (to include return postage) Includes: Sample containers Testing for lead and copper in drinking water samples Electronic data delivery of sample results Cost per sample is valid for up to 2,000 samples per month Shipping sample containers from lab via UPS to specified address	\$24	800	40	32,000	\$768,000
Retesting at 2.5% of sample size	\$24			800	\$19,200
Third Party contractor to provide the following: <ul style="list-style-type: none">• Train personnel at identified sites in EPA's 3 T's guidance• Assist school system personnel in executing acceptable sampling techniques• Write an executive summary for each facility based on sampling data• Assist school systems in developing pre and post testing communication plans• Assist school system personnel in executing any required follow up sampling• Assist school system personnel in developing plans where actionable levels exist					\$314,800
Total					\$1,102,000

APPENDIX A: PARTNERS UNDER THIS PROGRAM

Below are partners that will be involved in this program.

Georgia Environmental Protection Division of the Department of Natural Resources

Lewis Hays, Program Manager
2 Martin Luther King Jr. Drive
Suite 1152 East
Atlanta, GA 30334

Georgia Department of Public Health
Commissioner Kathleen Toomey, MD
2 Peachtree Street, NW
15th Floor
Atlanta, GA 30303-3186

Additional affected areas of the community will include:

- Local Health Departments
- Water Utilities
- School Principals/Directors
- School boards
- School nurse, Cafeteria staff, Athletics staff, and Teachers
- Local plumbing and construction contractors/suppliers